STATE OF CALIFORNIA BUSINESS, CONSUMER SERVICES AND HOUSING AGENCY DEPARTMENT OF FINANCIAL PROTECTION AND INNOVATION

TO: Bankroll Capital, Inc.
Narin Charanvattankit, also known as

Narin Charan, Chief Executive Officer and Director

500 Technology Drive, Suite 490

Irvine, California 92618

DESIST AND REFRAIN ORDER(For violations of Financial Code section 22100)

The Commissioner of Financial Protection and Innovation (Commissioner) finds that:

- 1. The Commissioner is authorized to pursue administrative actions and remedies against persons who engage in violations of the California Financing Law (Financial Code § 22000, et seq.) (CFL).
- 2. At all relevant times, Bankroll Capital, Inc. (Bankroll) is and was a California corporation using the business address 500 Technology Drive, Suite 490, Irvine, California 92618. Bankroll also used the website address www.bankroll.io.
- 3. At all relevant times, Narin Charanvattankit, also known as Narin Charin (Charanvattankit), is and was an individual with last known business address also at 500 Technology Drive, Suite 490, Irvine, California 92618. Charanvattankit is the Chief Executive Officer and Director of Bankroll.
- Beginning in at least 2019, Bankroll and Charanvattankit engaged in the business of a finance lender and/or broker in California by offering commercial loans on its website that claimed "simple access to capital for your business" and stated that over 10,000 businesses had been "served" with over "2 billion" in "funds delivered." Loan types offered on the Bankroll website were "working capital loans," "equipment financing," "cash advance," "line of credit," "SBA loan," and "custom loan[s]" with the "lowest rates."
- 5. Bankroll accepted applications from potential customers via its website, and communicated with them regarding applications via phone, email, and text. Bankroll obtained bank

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statements and other confidential information from applicants with the promise of lending money to those customers.

- 6. The Better Business Bureau (BBB) receives and posts customer reviews and complaints of various businesses. According to BBB, multiple people claim they have received loans from Bankroll. BBB also received complaints from customers claiming Bankroll told them they were approved, but then failed to loan them money as promised after receiving confidential and personal identifying information. Still other customers said that Bankroll baited them with low-interest teaser rates but then only offered loans at significantly higher rates than were initially advertised.
- 7. The Commissioner finds that the products offered by Bankroll and Charanvattankit described above constitute loans under the California Financing Law (CFL) (Fin. Code, § 22000 et seq.).
- 8. Neither Bankroll nor Charanvattankit have been issued a license by the Commissioner authorizing them to engage in the business of a finance lender and/or broker under the CFL, nor are they exempt from the licensing requirements of Financial Code section 22100.

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By reason of the foregoing, the Commissioner is of the opinion that Bankroll Capital, Inc. and			
Narin Charanvattankit, also known as Narin Charan, have engaged in the business of a finance lender			
and/or broker without having first obtained a license from the Commissioner in violation of Financial			
Code section 22100. Pursuant to Financial Code section 22712, Bankroll Capital, Inc. and Narin			
Charanvattankit are ordered to desist and refrain from engaging in the business of a finance lender			
and/or broker in the State of California without first obtaining a license from the Commissioner, or			
otherwise being exempt.			
This order is necessary, in the public interest, for the protection of California borrowers, and			
is consistent with the purposes, policies, and provisions of the California Financing Law.			
Dated: March 25, 2021 Sacramento, California MANUEL P. AL Commissioner of	VAREZ Financial Protection and Innovation		

By:		
•	MARY ANN SMITH	
	Deputy Commissioner	
	Enforcement Division	